

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO. 22-20552-CR-Damian/Valle

Plaintiff,

v.

DAVID RIVERA,

Defendants.

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**DAVID RIVERA’S MOTION FOR PERMISSION TO TRAVEL TO MEXICO**

Defendant, David Rivera (“Mr. Rivera”), through counsel<sup>1</sup>, respectfully moves this Honorable Court for permission to travel to Mexico for business purposes and states:

1. Pursuant to his conditions of pretrial release, Mr. Rivera’s travel is restricted to the Northern District of Georgia, the Middle and Southern Districts of Florida and the Southern District of New York. The geographic restrictions on travel can be modified if, “the supervising officer has approved travel in advance.” ([DE-24] at p 6, par. q). However, his travel is further restricted to court appearances and meetings with counsel ([DE-24] at p 6, par. r).

2. Rivera is an elected official in Miami-Dade County and is seeking re-election in this year’s election. Rivera was recently elected as a Delegate to the Republican National Convention.

3. Rivera is also a business development and political consultant by profession. He would like to travel to The Centro de Estudios de Veracruz “CEVER SIGLO XXI” (Veracruz

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<sup>1</sup> The filing of this motion is not intended as a permanent appearance by the undersigned counsel who have heretofore appeared only temporarily as counsel for Rivera. *See* Dkt. 37 and Local Rule 11.1(d)(1).

Studies Center “CEVER 21st Century”), which is a graduate level institution of higher learning based in Veracruz, Mexico, and Mexico City, Mexico. CEVER’s master’s and doctoral programs engage in educational partnerships throughout Latin America and Europe. CEVER is seeking to expand its international profile and alliances in the United States and is in discussion with Defendant Rivera to provide consulting services for this expansion.

4. Rivera needs to travel to Mexico in order to engage in meetings and discussions regarding this business opportunity.

5. Mr. Rivera’s pretrial officer, Alexander Moody, does not oppose the relief sought in this motion.

6. Once this request for travel has been approved by the Court, Mr. Rivera will provide the specific flight and hotel details to his Pretrial Services officer, as well as the government, in advance of his travel.

#### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 88.9(a), undersigned counsel certifies that he has conferred with AUSA Harold Schimkat who opposes the relief sought in this motion.

WHEREFORE, Rivera moves the Court for an order permitting him to travel to Mexico.

Respectfully submitted,

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for Defendant Rivera

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY on this 21st day of June, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in another authorized manner for those counsel or parties not authorized to receive electronically Notices of Electronic Filing.

/s/ Edward R. Shohat  
Edward R. Shohat